

EXHIBIT 2

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DONALD J. TRUMP FOR PRESIDENT, INC.,
MATTHEW SEELY, ALEXANDRA SEELY,
PHILIP O'HALLORAN, ERIC OSTERGREN,
MARIAN SHERIDAN, MERCEDES WIRSING,
and CAMERON TARSA,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity as
Michigan Secretary of State, MICHIGAN
BOARD OF STATE CANVASSERS, WAYNE
COUNTY, MICHIGAN, and WAYNE COUNTY
BOARD OF COUNTY CANVASSERS,

Defendants,

CIVIL ACTION

Case No. 1:20-cv-01083-JTN-PJG

Hon. Janet T. Neff

**PROPOSED INTERVENOR-DEFENDANTS DNC AND MICHIGAN DEMOCRATIC
PARTY'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

NOW COME Proposed Intervenor-Defendants DNC and Michigan Democratic Party ("Proposed Intervenor"), by their attorneys, and hereby move under Federal Rule of Civil Procedure 6(b)(1)(A) to extend the time for filing a response to Plaintiffs' complaint. Proposed Intervenor intend to file a motion to dismiss Plaintiffs' complaint pursuant to Rules 12(b)(1) and 12(b)(6). In accordance with the Court's Information and Guidelines regarding dispositive motions, Proposed Intervenor have submitted a pre-motion conference request. As this pre-motion conference request comes before filing an answer, Proposed Intervenor hereby move to extend the time for filing a response to Plaintiffs' complaint, as required under Guideline § IV(a)(1)(d).

WHEREFORE, for these reasons, Proposed Intervenor respectfully request that this Honorable Court grant their motion under Rule 6(b)(1)(A) to extend the time for filing a response

to Plaintiffs' complaint.

Dated: November 14, 2020.

Respectfully submitted,

/s/ Scott R. Eldridge

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*Admission pending